

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC. 20554**

In the Matter of)	
)	
Amendment of the Commission's)	RM-10621
Rules to Require License Grantee)	
of Each Space Station to File)	
Written Pre-Space Information)	
Within 30 Days after Receiving)	
A Launch Commitment)	
)	

To: The Commission

**COMMENTS of Nickolaus E. Leggett
N3NL Amateur Radio Operator**

The following are comments from Nickolaus E. Leggett, an amateur radio operator (Extra Class licensee – call sign N3NL), inventor (U.S. Patents # 3,280,929 and 3,280,930 and one invention patent pending), and a certified electronics technician (ISCET and NARTE).

The AMSAT Proposal

The AMSAT proposal to replace the 27-month pre-space notification with a much shorter period is a sound idea. This will help the Commission to accommodate the amateur radio satellites that are launched as secondary payloads. As a secondary payload, the amateur radio satellites are generally planned and integrated on a fairly short time frame.

Security Considerations

It is technically possible to use an amateur radio satellite or payload to carry out disruptive activities such as jamming or spoofing radio navigation transmissions. Such a

Trojan Horse satellite could be constructed of standard digital circuitry that would be secretly programmed to produce disruptive transmissions.

While existing amateur radio organizations would not develop and launch such a satellite, other parties with a terrorist agenda may be tempted to do so.

This possibility could be limited by having a longer notification period for organizations that have not filed such a notification before. This would allow the Commission or homeland security officials time to examine the new satellite if they determined a need to do so.

Suggested Actions

The Commission should grant AMSAT's request to change the rules allowing a much shorter notification period. Also, the Commission should consider a Notice of Inquiry (NOI) on security aspects of amateur radio satellites and the potential need for a longer notification period or other screening for first-time amateur radio satellite organizations.

Respectfully submitted,

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